

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Derrick Talerico (SBN 223763) David B. Zolkin (SBN 155410) WEINTRAUB ZOLKIN TALERICO & SELTH LLP 11766 Wilshire Blvd., Suite 730 Los Angeles, CA 90025 Telephone: 424-500-8552 Email: dtalerico@wztslaw.com dzolkin@wztslaw.com</p> <p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Broadway Avenue Investments, LLC</p>	<p>FOR COURT USE ONLY</p>
<p style="text-align: center;">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>	
<p>In re:</p> <p>SEATON INVESTMENTS, LLC, et al.,</p>	<p>CASE NO.: 2:24-bk-12079-VZ (Jointly Administered) CHAPTER: 11</p>
<p><input type="checkbox"/> Affects all Debtors. <input checked="" type="checkbox"/> Affects Seaton Investments, LLC (2:24-bk-12079-VZ) <input type="checkbox"/> Affects Colyton Investments, LLC (2:24-bk-12080-VZ) <input type="checkbox"/> Affects Broadway Avenue Investments, LLC (2:24-bk-12081-VZ) <input type="checkbox"/> Affects SLA Investments, LLC (2:24-bk-12082-VZ) <input type="checkbox"/> Affects Negev Investments, LLC (2:24-bk-12091-VZ) <input type="checkbox"/> Affects Alan Gomperts (2:24-bk-12074-VZ) <input type="checkbox"/> Affects Daniel Halevy (2:24-bk-12075-VZ) <input type="checkbox"/> Affects Susan Halevy (2:24-bk-12076-VZ)</p> <p style="text-align: right;">Debtor(s).</p>	<p>NOTICE OF MOTION FOR: ORDER AUTHORIZING DEBTOR TO OBTAIN POST-PETITION FINANCING PURSUANT TO 11 U.S.C. SECTION 364</p> <p>(Specify name of Motion)</p> <p>DATE: December 12, 2024 TIME: 11:00 a.m. COURTROOM: 1368 PLACE: 255 East Temple Street Los Angeles, CA 90012</p>

1. TO (*specify name*): The Honorable Vincent P. Zurzolo, United States Bankruptcy Judge, and all Parties in Interest:
2. NOTICE IS HEREBY GIVEN that on the following date and time and in the indicated courtroom, Movant in the above-captioned matter will move this court for an Order granting the relief sought as set forth in the Motion and accompanying supporting documents served and filed herewith. Said Motion is based upon the grounds set forth in the attached Motion and accompanying documents.
3. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one. (If you do not have an attorney, you may wish to consult one.)

4. **Deadline for Opposition Papers:** This Motion is being heard on regular notice pursuant to LBR 9013-1. If you wish to oppose this Motion, you must file a written response with the court and serve a copy of it upon the Movant or Movant's attorney at the address set forth above no less than fourteen (14) days prior to the above hearing date. If you fail to file a written response to this Motion within such time period, the court may treat such failure as a waiver of your right to oppose the Motion and may grant the requested relief.
5. **Hearing Date Obtained Pursuant to Judge's Self-Calendaring Procedure:** The undersigned hereby verifies that the above hearing date and time were available for this type of Motion according to the judge's self-calendaring procedures.

Date: 11/21/2024

WEINTRAUB ZOLKIN TALERICO & SELTH LLP

Printed name of law firm

/s/ Derrick Talerico

Signature

Derrick Talerico

Printed name of attorney

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

11766 Wilshire Blvd., Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled: **NOTICE OF MOTION FOR** (*specify name of motion*)
ORDER AUTHORIZING DEBTOR TO OBTAIN POST-PETITION FINANCING PURSUANT TO 11 U.S.C. SECTION 364

will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) 11/21/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF Service List

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (*date*) 11/21/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached US Mail Service List

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) 11/21/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent Zurzolo (via Priority Mail)
United States Bankruptcy Court
255 East Temple St., Suite 1360
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>11/21/2024</u>	<u>Martha E. Araki</u>	<u>/s/ Martha E. Araki</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

Seaton Investments, LLC – Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC.: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com; admin@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk, Ryan Coy:** zev.shechtman@saul.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com; ryan.coy@saul.com
- Attorneys for Creditor First Foundation Bank: **Scott R Albrecht:** scott.albrecht@sgsattorneys.com; jackie.nguyen@sgsattorneys.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam:** tbehnam@polsinelli.com; tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Jacquelyn H Choi:** jacquelyn.choi@rimonlaw.com; docketingsupport@rimonlaw.com
- Attorneys for Creditor United States of America on behalf of the Internal Revenue Service: **Robert F Conte:** robert.conte@usdoj.gov; caseview.ecf@usdoj.gov; usacac.tax@usdoj.gov
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Archway Real Estate Income Fund I SPE I, LLC: **Michael G. Fletcher, Bruce D. Poltrock, Paige Selina Poupart, Gerrick Warrington:** mfletcher@frandzel.com; ppoupart@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldridgepite.com; TSG@ecf.inforuptcy.com; tgaran@aldridgepite.com
- Attorneys for Creditor Los Angeles County Treasurer and Tax Collector: **Richard Girgado:** rgirgado@counsel.lacounty.gov
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@hrhlaw.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@eaccidents.com
- Attorneys for Creditor Wells Fargo Bank, N.A.: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpreion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov

Label Matrix for local noticing
0973-2
Case 2:24-bk-12079-VZ
Central District of California
Los Angeles

~~Archway Broadway Loan SPE, LLC, fka Archway
Frاندzel Robins Bloom & Csato, L.C.
c/o Michael Gerard Fletcher
1000 Wilshire Blvd., 19th Fl.
Los Angeles, Ca 90017-2457~~ NEF PARTY

~~Archway real estate income fund
c/o Frاندzel Robins Bloom & Csato, L.C.
1000 Wilshire Boulevard, 19th Floor
Los Angeles, CA 90017-2457~~
NEF PARTY

~~First Foundation Bank
c/o Scott R. Albrecht, Esq.
19800 MacArthur Blvd., Suite 1000
Suite 1000
Irvine, CA 92612-2433~~ NEF PARTY

~~Harvest Small Business Finance, LLC
Hemar, Rousse & Heald, LLP
c/o Jacqueline L. James
15910 Ventura Blvd., 12th Floor
Encino, CA 91436-2829~~ NEF PARTY

~~Korth Direct Mortgage Inc.
c/o Polsinelli LLP
2049 Century Park East
Suite 2900
Los Angeles, CA 90067-3221~~ NEF PARTY

(p)LOS ANGELES COUNTY TREASURER AND TAX COLLE
ATTN BANKRUPTCY UNIT
PO BOX 54110
LOS ANGELES CA 90054-0110

Seaton Investments, LLC
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

~~United States of America on behalf of Intern
Attn: Robert F. Conte
300 N. Los Angeles Street, Room 7211
Los Angeles, CA 90012-3342~~
NEF PARTY

~~Wells Fargo Bank, N.A.
c/o McCarthy & Holthus, LLP
2763 Camino Del Rio South, Suite 100
San Diego, CA 92108-3708~~
NEF PARTY

~~Los Angeles Division
255 East Temple Street,
Los Angeles, CA 90012-3332~~

AIRE Ancient Baths Los Angeles LLC
88 Franklin St
New York, NY 10013-4085

Alan D Gomperts
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Beverly Hills, CA 90212-3504

Alta Fire Pro
PO Box 7007
Mission Hills, CA 91346-7007

(p)BALBOA CAPITAL CORPORATION
575 ANTON BOULEVARD
12H FLOOR
COSTA MESA CA 92626-7169

CA Dept of Tax and Fee Admin
Account Info Group MIC29
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Sacramento, CA 94279-0029

California Refrigeration & Supply
1926 Glendon Ave Apt 4
Los Angeles, CA 90025-4661

Colyton Investments LLC
421 Colyton St
Los Angeles, CA 90013-2210

Daniel Halevy
257 S Linden Dr
Beverly Hills, CA 90212-3704

Daniel Halevy
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Los Angeles, CA 90035

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12466 Marsh Pointe Rd
Sarasota, FL 34238-2115

Deborah Feldman Esq
24611 Mulholland Hwy
Calabasas, CA 91302-2325

Franchise Tax Board
Bankruptcy Section MS A-340
PO Box 2952
Sacramento, CA 95812-2952

Gomperts and Halevy Family Trust
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

Halevy Family Trust
Dated September 6 2010
257 S Linden Dr
Beverly Hills, CA 90212-3704

~~Harvest Small Business Finance, LLC
c/o Jacqueline L. James
Hemar, Rousse & James, LLC
15910 Ventura Blvd., 12th Flr
Encino, CA 91436-2829~~ NEF PARTY

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

Korth Direct Mortgage Inc
135 San Lorenzo Ave Ste 600
Miami, FL 33146-1875

Korth Direct Mortgage Inc.
Attn: Keith E. Henrich
135 San Lorenzo Avenue, Suite 600
Coral Gables, FL 33146-1875

Mark Berkowitz CPA
5850 Canoga Ave Ste 220
Woodland Hills, CA 91367-6505

~~Polsinelli LLP~~
~~Attn: Garrick Vanderin Esq~~
~~2049 Century Park E Ste 2900~~
~~Los Angeles, CA 90067-3221~~
NEF PARTY

RG Fire Inc
8721 Laurel Canyon Blvd
Sun Valley, CA 91352-2919

Sean Rudes and Monfrere
3891 Beverly Blvd #328
Los Angeles, CA 90004

Simply Electrical
14101 S Budlong Ave
Gardena, CA 90247-2231

SoCalGas
P.O. Box 30337
Los Angeles CA 90030-0337

~~Sue Halevy~~
~~257 S Linden Dr~~
~~Beverly Hills, CA 90212-3704~~
DUPLICATE

~~United States Trustee (LA)~~
~~915 Wilshire Blvd, Suite 1850~~
~~Los Angeles, CA 90017-3560~~
NEF PARTY

Urban Lime
915 Mateo St Ste 301
Los Angeles, CA 90021-1784

WGW Sales Inc
555 Logan Ave
Winnipeg, MB R3A 054
CANADA

Wells Fargo Bank, N.A.
Attn: Bankruptcy Department
MAC N9286-01Y
Default Document Processing
P.O. Box 1629
Minneapolis, MN 55440-1629

Alan Gomperts
264 South Oakhurst Drive
Beverly Hills, CA 90212-3504

~~Avi Muhtar~~
~~Crown & Stone Law, P.C.~~
~~407 N. Maple Drive~~
~~Ground Floor~~
~~Beverly Hills, CA 90210-4272~~
NEF PARTY

~~Derrick Talerico~~
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~~Los Angeles, CA 90025-6577~~
FILING ATTN

Susan Halevy
257 South Linden Drive
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